



Raheem S. Watson, Esquire  
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January 24, 2014

**Via First-Class Postal Mail & Facsimile**

Honorable Joel Schneider, J.S.C.  
United States District Court, District of New Jersey  
Camden County  
Mitchell H. Cohen Building, 4<sup>th</sup> & Cooper Streets  
Camden, NJ 08101

**RE: Jason Dare v. Township of Hamilton, Docket No. 1:13-cv-01636**

Dear Judge Schneider:

As a follow up to the status conference held on January 16, 2014 please find the following discovery schedule per Your Honor's Order.

- (1) The deposition of the Plaintiff is scheduled to occur on Friday, February 7, 2014;
- (2) The depositions of the following Defendants are scheduled to occur on Wednesday, February 12, 2014: Police Chief Stacey Tappeiner and Sergeant Christopher Gehrig;
- (3) The depositions of the following Defendants are scheduled to occur on Friday, February 14, 2014: Patrol Officer James Esposito and Captain Michael Petuskey;
- (4) As of January 24, 2014, Plaintiff will have provided full responses to previously incomplete responses with respect to the Plaintiff's responses to Defendants' Interrogatories;
- (5) As of As of January 24, 2014, Plaintiff will have responded and produced documents in response to the Defendants' Request for Production of Documents propounded upon Plaintiff;
- (6) As of January 24, 2014, Defendants will have responded to Plaintiff's Interrogatories propounded upon Defendants;

- (7) As of January 24, 2014, Defendants will have responded to Plaintiff's Request for Production of Documents propounded upon Defendants;
- (8) As of January 24, 2014, Plaintiff will have served to Defendant HIPPA authorizations requested by Defendant;
- (9) Plaintiff intends to call an expert on police practices at trial;
- (10) Defendant intends to call a police practices expert at trial;
- (11) Plaintiff intends to call an economic expert at trial;
- (12) Defendants intend to call a medical expert at trial;
- (13) Defendant intends to call an economic expert at trial;
- (14) Plaintiff does not anticipate the need to call a medical expert, however; Plaintiff reserves the right to do so upon the review of Defendants medical expert report.

If Your Honor has any questions about the attached correspondence, please do not hesitate to contact either counsel at Your Honor's earliest convenience.

Respectfully,

A handwritten signature in blue ink that reads "Raheem S. Watson". The signature is fluid and cursive, with the first name "Raheem" and last name "Watson" clearly distinguishable.

Raheem S. Watson, Esquire  
*Attorney for Plaintiff Jason Dare*

Cc: A. Michael Baker, Esquire (Attorney for Defendants)